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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

JOINT STATUS REPORT

(Assigned to the Honorable David G.
Campbell)

14
15 The parties, by and through their respective undersigned counsel, and pursuant to
16 Case Management Order 40 (Doc. 13329) hereby submit this Joint Status Report.

17 Most of fact discovery has been completed, but the parties are still trying to
18 schedule two depositions of treating physicians.

19 Pursuant to Doc. 13481, Plaintiff's expert disclosures were due on December 4,
20 2018; however, the parties have agreed to a further extension allowing Plaintiff to disclose
21 expert reports Friday December 7, 2018.

22 The parties are working to schedule all case specific expert depositions at this time.
23 A tentative schedule for the expert depositions is as follows:

24 1/07/19 Darren Hurst, M.D.

25 1/08/19 Robert McMeeking

26 1/09/19 Lora White*

27 1/11/19 Derek Muehrcke, M.D.

28

1 The date for Lora White's deposition is currently tentative. The parties are
2 working together and Plaintiff's counsel is working with Ms. White to confirm a date that
3 will comply with the deadline set forth in CMO 39 for completion case-specific expert
4 depositions.

5 Due to ongoing health problems that may limit Plaintiff Debra Tinlin's ability to
6 travel and be present for the duration of trial, Plaintiff may request the Court to order
7 Plaintiff Tinlin's appearance and testimony in open court by contemporaneous
8 transmission from a different location.

9 RESPECTFULLY SUBMITTED this 4th day of December 2018.

10 BEUS GILBER PLLC

11 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine